July 26, 2010

John Hoppie, Project Manager
Dallas Area Rapid Transit
P.O. Box 660163
Dallas, Texas 75266-0163

RE: Proposed Cotton Belt Regional Rail Corridor (Tarrant, Dallas, and Collin Counties)

Dear Mr. Hoppie:

The Texas Parks and Wildlife Department (TPWD) has received the scoping request for the above-referenced project for which the Federal Transit Administration (FTA) and Dallas Area Rapid Transit (DART) intend to prepare an Environmental Impact Statement (EIS) to study the implementation of rail passenger service on the 26-mile long Cotton Belt Corridor from Dallas-Fort Worth International Airport (DFWIA) in Tarrant County, through a large portion of northwest Dallas County, to the existing DART Red Line in Collin County. TPWD has reviewed the scoping materials and portions of the associated Cotton Belt Corridor Conceptual Engineering and Funding Study (CBCCEFS) provided on the DART website (http://www.dart.org/cottonbelt). TPWD offers the following comments and recommendations for consideration in the EIS process and to minimize impacts to natural resources of the state including rare, threatened, and endangered species and their habitat.

Station Locations and East End Route Alternatives

The CBCCEFS indicates ten potential station locations and various east end route alternatives for the project. East end route Alternatives 5 and 8 would utilize a new alignment across US 75 to the Bush Turnpike Station. Aerial photography of the new alignment indicates that Alternatives 5 and 8 would follow along Spring Creek.

Recommendations: TPWD prefers that the route alternative chosen for the project utilize existing rail, transportation, and utility corridors to the extent feasible to minimize impact to undeveloped areas. Development in close proximity to and parallel to creeks and riparian corridors are discouraged. When considering the size and placement of proposed routes and station locations, TPWD prefers the use of existing cleared or disturbed sites and avoiding placement within upland and bottomland woodlands, wetland areas, riparian habitat, greenspace and parkland. Elevating the rail line through these areas should be considered in the EIS if avoidance is not feasible.

Stream Crossings and Riparian Habitat

Riparian areas are vegetated corridors along drainages that generally provide nesting habitat for birds, soil stabilization for enhanced water quality, and food, cover, and travel corridors for wildlife. Because many species of wildlife travel along riparian corridors it is
important to reduce disturbance and fragmentation to riparian corridors. Riparian habitat is a priority for conservation by TPWD across the state.

**Recommendation:** TPWD prefers that necessary stream crossings be placed in exiting open spaces where the riparian buffer is previously cleared or narrow to minimize the amount of riparian habitat disturbance. Crossings should span the riparian vegetation, if feasible, and be placed perpendicular to the stream to minimize loss of riparian habitat.

**Recommendation:** Where riparian areas would be crossed using bridge spans, the design should allow usable vertical and horizontal space beneath the bridges for local terrestrial wildlife to comfortably cross under the facility.

**Recommendation:** The amount of vegetation removed, trampled, or disturbed should be minimized in riparian areas. To avoid soil disturbances, machinery and other vehicles should utilize nearby roadways and bridges when crossing drainages, wetlands, and creeks.

**Rare Resources**

The TPWD Annotated County Lists of Rare Species are available at [http://gis.tpwd.state.tx.us/TpwdEndangeredSpecies/DesktopDefault.aspx](http://gis.tpwd.state.tx.us/TpwdEndangeredSpecies/DesktopDefault.aspx). These lists provide information regarding rare species that have potential to occur within each county. Rare species could potentially be impacted if suitable habitat is present at or near the project site.

**Recommendation:** The county list(s) should be used as a reference to determine if suitable habitat occurs within the proposed project ROW and to determine if the project would impact the species or habitats. The project should be designed and constructed to avoid or minimize adverse impacts and to mitigate any impacts when rare plant and animal species and their habitat are found within or near the project area.

**Landscaping and Water Conservation**

There has been a dramatic increase in water demand across North Texas associated with increased development and population growth, thus water conservation is essential to this area. Native vegetation is adapted to the soil and climate of the area and usually requires less maintenance and watering than introduced species. The disease tolerance of native vegetation provides longevity to the landscape without high cost. Native landscapes provide an enjoyable outdoor space for passengers while also benefitting wildlife such as birds and butterflies. Mature trees and shrubs provide nesting, loafing, and forage habitat for birds and other wildlife.

**Recommendation:** Site planning and construction techniques should be designed to avoid and preserve existing mature native trees and shrubs. Native replacement trees should be planted as mitigation for trees removed.
Recommendation: To enhance the value of the proposed project to both wildlife and passengers and to aid in water conservation, native vegetation beneficial to fish and wildlife should be used for landscaping. Native species appropriate for the area can be found at the TPWD Wildscapes site http://www.tpwd.state.tx.us/huntwild/wild/wildscapes/, the Texas Plant Information Database http://tpid.tpwd.state.tx.us/overview.asp, and the Lady Bird Johnson Wildflower Center website http://www.wildflower.org/collections/.

Parks and Recreation Areas

The CBCCEFS indicated parks, hike and bike trails, greenbelts, nature areas, and preserves located within the study area and identified three laws/regulations that need to be considered including: Section 4(f) of the U.S. Department of Transportation (USDOT) Act of 1966, Texas Parks and Wildlife Code Title 3 Chapter 26, and Section 6(f) of the Land and Water Conservation Fund (LWCF) Act.

The TPWD allocates recreation grant funds each year, some of which include trails and openspace. Additionally, the Texas Department of Transportation (TXDOT) allocates federal funds for hike and bike trails.

Recommendation: The EIS should address which, if any, of the three laws above apply for each park, hike and bike trail, greenbelt, nature area, and preserve that would be potentially impacted by the project. DART should coordinate with the Recreation Grants Program of TPWD (512) 389-8175 to determine whether or not any portion of this project will impact Section 26 properties or LWCF projects.

TPWD appreciates the opportunity to provide comments regarding this project. Please continue to coordinate regarding this project with staff of the TPWD Wildlife Habitat Assessment Program addressed to myself or Ms. Kathy Boydston, Program Leader, Wildlife Habitat Assessment Program, Texas Parks and Wildlife Department, 4200 Smith School Road, Austin, Texas 78744. If you have any questions, please contact me at (903) 322-5001.

Sincerely,

Karen B. Hardin
Wildlife Habitat Assessment Program
Wildlife Division

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